

**THOMPSON LAW, LLC**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**BIGBANG ENTERTAINMENT, LLC,**

**Plaintiff,**

**vs.**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,**

**Defendant.**

**CASE NO. 1:23-CV-00008**

**PLAINTIFF BIG BANG  
ENTERTAINMENT, LLC'S STATEMENT  
OF NON-OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS CAUSE OF  
ACTION FIVE FOR NEGLIGENT  
BREACH OF FIDUCIARY DUTY AND  
CAUSE OF ACTION SIX FOR  
INTENTIONAL BREACH OF FIDUCIARY  
DUTY.**

**COMES NOW**, the Plaintiff, BigBang Entertainment, LLC, ("Big Bang") by and through counsel, to offer the following statement of non-opposition to Defendant, Imperial Pacific International (CNMI), LLC,'s ("IPI") Motion to Dismiss Counts V and VI.

In consideration of the points raised in IPI's motion to dismiss, the nature of the relationship between the parties, and based on further research of the current state of the law, Big Bang hereby notifies the Court and opposing counsel of its intention to not oppose dismissal of Count V for negligent breach of fiduciary duty and Count VI for intentional breach of fiduciary

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1 duty. This statement of non-opposition is limited to IPI's Motion to Dismiss Counts V and IV of  
2 the Complaint. Big Bang intends vigorously prosecute all remaining causes of action.

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4 Respectfully submitted this 14th day of June, 2023.

5 /s/ Colin M. Thompson  
6 **THOMPSON LAW, LLC**  
7 Colin M. Thompson  
8 CNMI Bar No. F0221  
9 *Attorney for BigBang*  
10 *Entertainment, LLC*  
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